

Brief comments: That is interesting background on Montana's bold, start-from-scratch analysis of the need for regulatory boards. We (AAMFT) have seen legislatures in 48 states create licensure boards for Marriage and Family Therapists, based on the need for a public protection mechanism that includes peer review.

[It] is incorrect that MFTs are identical to LCPCs and LCSWs. In MFT a systemic, relational approach is an integral part of the education and training, not an add-on. California ... does not have LPCs.... MFTs, LCSWs and educational psychologists are all regulated by the same board (Board of Behavioral Sciences), but as distinct professions with separate laws and separate peer review.

Best regards,

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